

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

ANNE SMITHERS, *et al.*

Plaintiffs,

V.

C.A. No. 1:18cv676 (TSE/IDD)

FRONTIER AIRLINES, INC., *et al.*

Defendants.

**DEFENDANTS FRONTIER AIRLINES, INC.'S AND  
AIRCRAFT SERVICES INTERNATIONAL, INC.'S  
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

Defendants Frontier Airlines, Inc. and Aircraft Services International, Inc., by counsel, pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), hereby move this Court for an Order dismissing the First Amended Complaint filed in this action by Plaintiffs Anne Smithers, James Mims, Ross Wiley, Thomas Wiley, Henry Wiley By His Mother and Next Friend Anne Smithers, and Hanna Del Signore.

The grounds for this Motion are set forth in the accompanying Memorandum.

September 14, 2018

Respectfully submitted,

/S/ ELAINE CHARLSON BREDEHOFT

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*Counsel for Defendants Frontier Airlines, Inc.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of September, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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